

EXHIBIT 4

defenses pursuant to Federal Rule of Civil Procedure 26(a)(1). Further discovery and developments in the case may dictate the need to identify additional persons with discoverable information, relevant documents, and tangible objects that Plaintiffs may use to support their claims or defenses. In accordance with Federal Rule of Civil Procedure 26(e)(1)(A), Plaintiffs reserve the right to supplement their Amended Initial Disclosures if and when they identify additional persons, documents, and tangible objects that may be used to support their claims and defenses.

These Amended Initial Disclosures are made solely for the purpose of this action. These Amended Initial Disclosures are made subject to all objections as to competence, materiality, relevance, or other objection as to admissibility that may apply in the event that any such response, or the information it contains, is sought to be used in court. Plaintiffs expressly reserve all such objections. Pursuant to Federal Rule of Civil Procedure 26(b), Plaintiffs object to disclosure or production of documents and materials generated during the course of this litigation that constitute protected attorney work product or that contain privileged attorney-client communications, or confidential personal or proprietary information. These Amended Initial Disclosures are not a waiver of any protected attorney work product, privileged attorney-client communications, or confidential personal or proprietary information relating to the witnesses or documents described.

Plaintiffs have attempted to identify all persons, documents, and other materials within their knowledge, possession, custody, or control that may be used to support their

claims or defenses in this case. Counsel will provide copies of any identified document upon request.

Rule 26(a)(1)(A)(i). The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Response: Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(i), Plaintiffs identify the following individuals who may have discoverable information with respect to Plaintiffs’ claims or defenses:

1. Plaintiff Maryland Shall Issue, Inc. (“MSI”), for itself and its members

1332 Cape St. Claire Road, Unit 342
Annapolis, MD 21409
(410) 849-9197

Contact through undersigned counsel

Subjects of discoverable information include but are not limited to: (1) the membership of MSI, which includes individuals who do not possess an HQL, desire to possess a handgun, and who are subject to the HQL requirements; (2) individual members of MSI who, due to the expense and inconvenience of the HQL requirements, have been deterred from purchasing a handgun; (3) individual members of MSI who have an urgent need for a handgun, but who, due to the expense and inconvenience of the HQL requirements, have been deterred from purchasing a handgun; (4) individual members of MSI who hunt for food and are in need of a handgun, but who, due to the expense and inconvenience of the HQL

requirements, have been deterred from purchasing a handgun; (5) individual members of MSI who live in an urban area with no access to Maryland State Police (“MSP”) certified handgun trainers and/or a shooting range and are in need of handgun, but who, due to the expense and inconvenience of the HQL live-fire requirement, have been deterred from purchasing a handgun; (6) individual members of MSI who live in an area with no access to MSP approved fingerprint vendors and are in need of a handgun, but who, due to the expense and inconvenience of the HQL live-scan fingerprinting requirements, have been deterred from purchasing a handgun.

2. Plaintiff Atlantic Guns, Inc.

944 Bonifant Street
Silver Spring, MD 20910
(301) 585-4448
Contact through undersigned counsel

Subjects of discoverable information include but are not limited to: (1) Atlantic Guns’ ownership and good standing of a business lawfully and responsibly selling firearms throughout the state as a federally-licensed firearms dealer and Maryland Regulated Firearms Dealer; (2) Atlantic Guns’ loss of business due to the burdensome requirements of the HQL, which has deterred potential customers from purchasing handguns at Atlantic Guns; (3) individual potential customers of Atlantic Guns who are

in need of a handgun, but who, due to the expense and inconvenience of the HQL requirements, have been deterred from purchasing a handgun.

3. Plaintiff Deborah Kay Miller

297 Aston Forest Lane
Crownsville, MD 21032-1605
Contact through undersigned counsel

Subjects of discoverable information include but are not limited to: (1) Ms. Miller's need for a handgun due to her employment as a Department of Defense federal contractor and victim of a data breach which sacrificed the security of her detailed personal information; (2) Ms. Miller's intent to purchase a handgun for self-defense in the home, target practice, and other lawful purposes; (3) Ms. Miller's inability to fulfill the burdensome requirements of the HQL due to her inability to take time off from work; (4) Ms. Miller's inability to fulfill the unnecessary four-hour training requirement of the HQL due to health issues resulting from multiple surgeries; (5) Ms. Miller being deterred from purchasing a handgun for the aforementioned reasons; (6) Ms. Miller's confusion as to "receive" and "receipt" pursuant to the HQL statutory language.

4. Plaintiff Susan Brancato Vizas

8002 Bull Rush Court
Frederick, MD 21701-1508
Contact through undersigned counsel

Subjects of discoverable information include but are not limited to: (1) Ms. Vizas' successful fulfillment of Hunter Safety Training; (2) Ms. Vizas'

intent to purchase a handgun for self-defense in the home, target practice, and other lawful purposes; (3) Ms. Vizas being deterred from purchasing a handgun due to the expense and inconvenience of the additional HQL requirements.

5. John Matthew Clark

1240 Arnold Road
Westminster, MD 21157
Contact through undersigned counsel

Deterred by the cost of the HQL itself, training, the cost of 3rd party fingerprinting, and the hassle of finding an “approved” fingerprint service provider. Mr. Clark works as a computer/web server technician and is 47 years old. He would have to take a day off work and use vacation time to have fingerprinting done. Mr. Clark reported that his county sheriff refuses to cooperate with HQL applicants.

6. Dana Hoffman

7051 Carroll Avenue, Apt. 915
Takoma Park, MD 2091?
Contact through undersigned counsel

Deterred by the HQL requirements, especially the live fire and training requirements. Ms. Hoffman is 74 years old and is confined to a wheelchair. She has a medical condition that makes it impossible for her to obtain training, including the MSP live fire requirement. Ms. Hoffman does not own any guns but wishes to purchase a handgun for self-defense in her home.

7. Scott Miller

1004 Murdoch Court
Crofton, MD 21114
Contact through undersigned counsel

Deterred by the cost and time requirement. Mr. Miller is a 27-year-old Emergency Medical Technician. Mr. Miller's ambulance was recently caught in a firefight in D.C., and was hit by 7 bullet rounds. Although he could not carry while on the job, Mr. Miller still wants to protect himself. Mr. Miller currently does not own any handguns or have any permit, as his lifelong residency in Maryland has effectively discourages any such acquisitions.

8. Any person identified in Defendants' Rule 26 Disclosure Statements.
9. Any person necessary to authenticate documents.
10. Any person identified in any deposition, answer to interrogatory, response to non-party production, request for production, or other document produced in this case.
11. Defendant William M. Pallozzi, in his capacity of Superintendent, MSP

1201 Reisterstown Road
Pikesville, MD 21208
(410) 486-3101

Subjects of discoverable information include but are not limited to: (1) the operations of MSP in developing regulations and requirements to enforce Md. Code Ann., Public Safety, § 5-117.1, and all persons involved in those operations; (2) the deterrent effect of the HQL on handgun transfers in

Maryland; (3) the requests of citizens to be relieved of some or all of the excess cost and burden of the HQL requirements; (4) the timeline for processing and approving the HQL application; (5) the locations and availability of vendors necessary to fulfill the HQL requirements; (6) the MSP use of fingerprints submitted pursuant to the HQL application; (7) the requests of citizens or citizen-members groups to define and/or clarify “receive” or “receipt.”

12. Any person or persons involved in the MSP decision to establish the HQL application fee at \$50.
13. Any person or persons involved in the MSP decision to establish the HQL application “live fire” requirement.
14. Any person with current licensing authority for the HQL.

Rule 26(a)(1)(A)(ii). A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

Response: Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(ii), Plaintiffs identify the following documents, electronically stored information, and tangible things that Plaintiffs have in their possession, custody or control that may be used to support their claims or defenses:

1. Md. Code Ann., Public Safety, § 5-117.1.
2. Legislative History of Md. Code Ann., Public Safety, § 5-117.1.

3. Legislative History of Maryland Senate Bill 281.
4. 2013 Laws of Maryland Chapter 427.
5. General Assembly of Maryland, *2013 Regular Session Proceedings – House Audio, April 2, 2013, Session 2*, at 19:05 (April 2, 2013) *available at* http://mgaleg.maryland.gov/webmga/frmlegislation.aspx?id=2013rs_house_audio&stab=02&pid=legisnlist&tab=subject3&ys=2013rs
6. MD COMAR ADC 29.03.01.01, *et seq.*
7. MSP Standard Operating Procedure Index # 29-1403.
8. Md. Code Ann., Public Safety, § 5-118.
9. Md. Code Ann., Public Safety, § 5-122.
10. Md. Code Ann., Public Safety, § 5-123.
11. Md. Code Ann., Public Safety, § 5-124.
12. Md. Code Ann., Public Safety § 5-144.
13. Md. Code Ann., State Government, § 10-125(d).
14. Md. Code Ann., State Government, § 10-222(h)(3)(vii).
15. Maryland Constitution Art. V, § 7.
16. 2013 MD REG TEXT 338193 (NS) (Dec. 13, 2013).
17. Maryland Attorney General J. Joseph Curran, *A Farewell to Arms The Solution to Gun Violence in America* (Oct. 20, 1999) *available at* <http://rkba.org/research/curran/guns.pdf>
18. MSP Handgun Qualification License FAQ (last accessed Sept. 25, 2017) *available at*

<http://mdsp.maryland.gov/Organization/Pages/CriminalInvestigationBureau/LicensingDivision/FAQs.aspx>.

19. Maryland State Police, *Fingerprinting* (last accessed Sept. 25, 2017) *available at* <http://mdsp.maryland.gov/Organization/Pages/CriminalInvestigationBureau/LicensingDivision/Fingerprinting.aspx>.
20. NSSF Report 2017 Edition, Firearms Retailer Survey Report: Trend Data 2008-2016.
21. NSSF Report, More Guns - Fewer Crimes: Favorable Trends.
22. NSSF Report, Sport Shooting Participation in the United States in 2016.
23. FBI Uniform Crime Reports for Maryland.
24. March 1, 2013 Prepared Testimony of Mark W. Pennak In Opposition to HB 294.
25. February 21, 2017 Written Testimony of Mark Pennak, President of MSI, before the Maryland Handgun Permit Review Board.
26. March 14, 2017 Written Testimony of Mark Pennak, President of MSI, in support of HB 875.
27. March 14, 2017 Written Testimony of Mark Pennak, President of MSI, in support of HB 905.
28. NRA's Basics of Pistol Shooting: Instructor Led Training. Lesson Plans & Shooting Qualifications.
29. NRA's Defensive Pistol Module: Course Outline & Lesson Plans.
30. Mark Pennak's NRA Instructor Certification & 2018 HQL certificate.

31. Deborah K. Miller's 2013 1040 form, 2013 502/ 502B forms, 2014 1040 form, 2014 502/ 502B forms, 2015 1040 form, 2015 502 form, 2016 1040 form, 2016 502 form.
32. Deborah K. Miller's 2010 W-2 form, 2010 W-2 and Earnings Summary, December 2017 Leave and Earnings Statement, April 2017 Leave and Earnings Statement, March 2012 Leave and Earnings Statement.
33. Deborah K. Miller's Quitclaim deed for road abandonment for a trail in Herald Harbor, 2001 deed for six lots in Herald Harbor on the Severn, affidavit that they will reside at the property in Crownsville, State of MD Land Instrument Intake Sheet for deed and deed of trust.
34. Deborah K. Miller's MD Certificates of Title for automobiles.
35. Deborah K. Miller's itemized bill from Ortho and Sports Medicine Center, doctor's note from Orthopaedics & Spine Care, MVA Parking placard/ license plates for individuals with a disability application.
36. Susan B. Vizas's PNC Bank Performance checking statements for January, February, March, May, June, July, August, September, October, November, and December 2016 as well as January, February, March, April, May, June, July, August, September, October, November 2017.
37. Susan B. Vizas's SAFE Federal Credit Union statements from every month in 2016 and January-November 2017.
38. Susan B. Vizas's 2016 1040 form, 2015 1040 form, 2014 1040 form, and 2013 1040 form.

39. Susan B. Vizas's Notary certified, signed document confirming they are first-time Maryland home buyers purchasing property.
40. Susan B. Vizas's MD Certificates of Title for automobiles.
41. Susan B. Vizas's Edward Jones Portfolio Summary for January, February, March, May, June, August, October, November, and December 2016 as well as January, February, March, April, May, June, July, August, September, October, and November 2017.
42. Colonel Thomas E. Hutchins, Maryland State Police Superintendent, Crime in Maryland: 2004 Uniform Crime Report.
43. Colonel Thomas E. Hutchins, Maryland State Police Superintendent, Crime in Maryland: 2005 Uniform Crime Report.
44. Colonel Thomas E. Hutchins, Maryland State Police Superintendent, Crime in Maryland: 2006 Uniform Crime Report.
45. Colonel Terrence B. Sheridan, Maryland State Police Superintendent, Crime in Maryland: 2007 Uniform Crime Report.
46. Colonel Terrence B. Sheridan, Maryland State Police Superintendent, Crime in Maryland: 2008 Uniform Crime Report.
47. Colonel Terrence B. Sheridan, Maryland State Police Superintendent, Crime in Maryland: 2009 Uniform Crime Report.
48. Colonel Terrence B. Sheridan, Maryland State Police Superintendent, Crime in Maryland: 2010 Uniform Crime Report.

49. Colonel Marcus L. Brown, Maryland State Police Superintendent, Crime in Maryland: 2011 Uniform Crime Report.
50. Colonel Marcus L. Brown, Maryland State Police Superintendent, Crime in Maryland: 2012 Uniform Crime Report.
51. Colonel Marcus L. Brown, Maryland State Police Superintendent, Crime in Maryland: 2013 Uniform Crime Report.
52. Colonel William M. Pallozzi, Maryland State Police Superintendent, Crime in Maryland: 2014 Uniform Crime Report.
53. Colonel William M. Pallozzi, Maryland State Police Superintendent, Crime in Maryland: 2015 Uniform Crime Report.
54. Colonel William M. Pallozzi, Maryland State Police Superintendent, Crime in Maryland: 2016 Uniform Crime Report.
55. Colonel William M. Pallozzi, Maryland State Police Superintendent, Crime in Maryland: 2017 Uniform Crime Report.
56. Justin Fenton, 'Over the top,' witness says: Bail bondsman tells of getting bags of stolen drugs from Sgt. Jenkins, The Baltimore Sun (2018), http://digitaledition.baltimoresun.com/infinity/article_share.aspx?guid=cf98cdcb-7216-4a98-9565-a4c99d4037d1 (last accessed Feb. 6, 2018).
57. Maryland Automated Firearms Services System (MAFSS) Yearly Count of Firearm Transfers by Gun Type (Case 1:13-cv-02841-CCB, Document 62-5, Filed 04/11/14).

58. Daniel W. Webster, ScD, MPH, Shani A.L. Buggs, MPH, and Cassandra K. Crifasi, PhD, MPH, *Estimating the Effects of Law Enforcement and Public Health Interventions Intended to Reduce Gun Violence in Baltimore* (January 11, 2018) available at <https://www.jhsph.edu/research/centers-and-institutes/johns-hopkins-center-for-gun-policy-and-research/publications/JHSPH-Gun-Violence-in-Baltimore.pdf>.
59. Cassandra K. Crifasi, Molly Merrill-Francis, Daniel W Webster, Garen J Wintemute, Jon S. Vernick, *Changes in the legal environment and enforcement of firearm transfer laws in Pennsylvania and Maryland*. Injury Prevention. Published Online First: January 13, 2018.
60. SFS Training, Flyer on Firearms Training Requirement.
61. Letter from Sgt. James J. Kozlowski, Handgun Permit Unit Supervisor, to enclose new guidelines for the Firearm's Qualification for the H.Q.L. and Handgun Wear/Carry Permit, as well as the revised Qualification Form which should be utilized effective October 1, 2013 (September 16, 2013).
62. Frederick Chapter of the Izaak Walton League of America, Information on 2016 Courses.
63. Maryland State Police Licensing Division Weekly Reports dated September 29, 2017 through November 2, 2017.
64. Maryland State Police Advisory LD-HQL-17-003, *Interpretation of "Receive" in PS §5-117.1* (November 17, 2017).

65. Maryland Shooters Blog, *Number of active W&C/HQL as of August 2017* (September 19, 2017).
66. U.S. Gov't Accountability Off., GAO-01-427, *Firearms Purchased from Federal Firearm Licensees Using Bogus Identification* (March 2001).
67. Atlantic Guns e-mail communications with customers regarding the HQL.
68. Maryland State Police Advisory LD-HQL-Advisory-16-001, *Maryland Licensed Firearms Dealers – Removal of Handgun Qualification License (HQL) Card Photo* (June 21, 2016).
69. Maryland State Police Advisory LD-HQL-17-004, *Alternative Ammunition for Handgun Qualification License (HQL) Live Fire Training Component* (November 17, 2017).
70. Atlantic Guns' Handgun Qualification License (HQL) Information Sheet.
71. Atlantic Guns' website printouts reflecting the make and model and price of handguns in Plaintiff's inventory (last accessed Feb. 6, 2018).
72. Alison Knezevich, Baltimore County residents concerned over rise in violent crime, *The Baltimore Sun* (March 19, 2018), *available at* <http://www.baltimoresun.com/news/maryland/crime/bs-md-co-county-crime-20180315-story.html> (last accessed March 22, 2018).
73. Atlantic Guns Handgun Sales Gross Revenue and Number of Handguns Sold By Year.
74. 77R handgun training video used prior to the HQL implementation to satisfy the then-existent training requirement.

75. Maryland Automated Firearms Services System (MAFSS), Yearly Count of Handgun Transfers by Atlantic Guns, Inc., 2000 through 2017.
76. U.S. Department of Justice Bureau of Alcohol, Tobacco, Firearms, and Explosives, Office of Strategic Intelligence and Information, Maryland Firearms Tracing System Data Report for January 1, 2017 – December 31, 2017
77. U.S. Department of Justice Bureau of Alcohol, Tobacco, Firearms, and Explosives, Office of Strategic Intelligence and Information, Maryland Firearms Tracing System Data Report for January 1, 2016 – December 31, 2016, *available at* <https://www.atf.gov/firearms/docs/undefined/2016tracestatsmarylandpdf/> download.
78. U.S. Department of Justice Bureau of Alcohol, Tobacco, Firearms, and Explosives, Office of Strategic Intelligence and Information, Maryland Firearms Tracing System Data Report for January 1, 2015 – December 31, 2015, *available at* <https://www.atf.gov/docs/163521-mdatfwebsite15pdf/download>.
79. U.S. Department of Justice Bureau of Alcohol, Tobacco, Firearms, and Explosives, Office of Strategic Intelligence and Information, Maryland Firearms Tracing System Data Report for January 1, 2014 – December 31, 2014, *available at* <https://www.atf.gov/about/docs/report/maryland-firearms-trace-data-%E2%80%93-2014/download>.
80. U.S. Department of Justice Bureau of Alcohol, Tobacco, Firearms, and Explosives, Office of Strategic Intelligence and Information, Maryland Firearms Tracing System Data Report for January 1, 2013 – December 31, 2013, *available*

at <https://www.atf.gov/resource-center/docs/143894-mdatfwebsite13pdf/download>.

81. U.S. Department of Justice Bureau of Alcohol, Tobacco, Firearms, and Explosives, Office of Strategic Intelligence and Information, United States Federal Firearms Licensee Thefts/Losses Firearms Tracing System Data Report for January 1, 2017 – December 31, 2017, *available at* <https://www.atf.gov/resource-center/docs/report/theftdatausa2017pdf/download>.
82. U.S. Department of Justice Bureau of Alcohol, Tobacco, Firearms, and Explosives, Office of Strategic Intelligence and Information, United States Federal Firearms Licensee Thefts/Losses Firearms Tracing System Data Report for January 1, 2016 – December 31, 2016, *available at* <https://www.atf.gov/resource-center/docs/undefined/osii508fflthefts-lossescy16pdf/download>.
83. U.S. Department of Justice Bureau of Alcohol, Tobacco, Firearms, and Explosives, Office of Strategic Intelligence and Information, United States Federal Firearms Licensee Thefts/Losses Firearms Tracing System Data Report for January 1, 2015 – December 31, 2015, *available at* <https://www.atf.gov/firearms/docs/report/2015-summary-firearms-reported-lost-and-stolen/download>.
84. U.S. Department of Justice Bureau of Alcohol, Tobacco, Firearms, and Explosives, Office of Strategic Intelligence and Information, United States Federal Firearms Licensee Thefts/Losses Firearms Tracing System Data Report

for January 1, 2014 – December 31, 2014, *available at*

<https://www.atf.gov/resource-center/docs/2014-summary-firearms-reported-lost-and-stolenpdf/download>.

85. U.S. Department of Justice Bureau of Alcohol, Tobacco, Firearms, and Explosives, Office of Strategic Intelligence and Information, United States Federal Firearms Licensee Thefts/Losses Firearms Tracing System Data Report for January 1, 2013 – December 31, 2013, *available at* <https://www.atf.gov/resource-center/docs/2013summary-firearmsreportedlostandstolenpdf/download>.
86. Maryland Coordination and Analysis Center Data, Homicides per Month per Jurisdiction by Type of Weapon for the period of October 1, 2012 through December 31, 2017.
87. Maryland Coordination and Analysis Center Data, Non-Fatal Shootings per Month per Jurisdiction for the period of October 1, 2012 through December 31, 2017.
88. 2A Maryland, Maryland Homicides by Month and Modality for the period of October 1, 2012 through December 31, 2017.
89. 2A Maryland, Maryland Homicides & Shootings: Total Homicides, Firearm Homicides & Non-Fatal Shootings for the period of October 1, 2012 through December 31, 2017.
90. 2A Maryland, Maryland Homicides, Average Temperatures, Precipitation by Month for the period of October 1, 2012 through December 31, 2017.

91. 2A Maryland, Homicides in Maryland by Jurisdiction for the period of October 1, 2012 through September 30, 2017.
92. FBI NICS Data Related to Handgun Background Checks for 2006 through 2017.
93. Declaration of Delaine Brady submitted in Kolbe v. O'Malley (Case 1:13-cv-02841-CCB, Document 44-10, Filed 02/14/14) and any attachments thereto.
94. Declaration of Delaine Brady submitted in Kolbe v. O'Malley (Case 1:13-cv-02841-CCB, Document 62-5, Filed 04/11/14) and any attachments thereto.
95. United States of America v. Police Department of Baltimore City, et. al. (Case 1:17-cv-00099-JKB, Document 2-2, Filed 01/12/17), Consent Decree, *available at* <https://www.justice.gov/opa/file/925056/download>
96. Maryland State Police Licensing Division Firearms Services Section, 2015 Maryland Firearms Dealer Seminar PowerPoint, *available at* <http://mdsp.maryland.gov/Organization/Licensing%20Division%20Documents/Dealer%20Seminar%202015%20Final.pdf>
97. Maryland State Police Licensing Division Firearms Services Section, 2014 Maryland Firearms Dealer Seminar PowerPoint, *available at* http://mdsp.maryland.gov/Organization/Licensing%20Division%20Documents/Dealer_Presentation_CW2.pdf
98. Maryland State Police Licensing Division Firearms Registration Section, 2013 Maryland Firearms Dealer Seminar PowerPoint, *available at* <http://mdsp.maryland.gov/Organization/Licensing%20Division%20Documents/DealerPPT.pdf>

- 99. Plaintiffs' Expert Reports and references therein.
- 100. Defendants' Expert Reports and references therein.
- 101. All documents exchanged during discovery.
- 102. All documents referenced in discovery responses.
- 103. All documents used as exhibits in any deposition in this case.

Rule 26(a)(1)(A)(iii). A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

Response: Plaintiffs have not asserted a claim for damages in this action, but reserve the right to supplement their response and reserve the right to seek and recover damages equal to the costs incurred in pursuing this action, including attorney's fees under 42 U.S.C. § 1988(b).

Rule 26(a)(1)(A)(iv). For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Response: Not applicable.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of April, 2018, a copy of the foregoing Rule 26(a)(1)(A) Amended Disclosures of Plaintiffs was sent via electronic mail to:

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